



State of Washington
PUBLIC DISCLOSURE COMMISSION
711 Capitol Way Rm. 206, PO Box 40908 • Olympia, Washington 98504-0908
(360) 753-1111 • FAX (360) 753-1112
Toll Free 1-877-601-2828 • E-mail: pdcc@pdcc.wa.gov • Website: www.pdcc.wa.gov

December 19, 2018

Delivered electronically to “chair@kitsapdemocrats.org”

Subject: PDC Case 42373

Dear Kitsap County Democratic Central Committee:

Below is a copy of an electronic letter sent to concerning a complaint filed with the Public Disclosure Commission (PDC).

As noted below to Glen Morgan, the PDC will not be conducting a more formal investigation into these allegations or taking further enforcement action in this matter.

However, pursuant to WAC 390-37-060(1)(b), this letter serves as a warning letter concerning your failure to timely deposit contributions and to timely report contribution and expenditure activity. Staff expects you to institute procedures to ensure funds are timely deposited and reports are filed according to their statutory deadlines. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

If you have questions, you may contact Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail pdcc@pdcc.wa.gov.

Sincerely,

/s _____
Fox Blackhorn
Compliance Coordinator 2

Endorsed by,

/s _____
Peter Lavalley
Executive Director



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December 19, 2018

Delivered electronically to “glen@wethegoverned.com”

Subject: Complaint regarding Kitsap County Democratic Central Committee, PDC Case 43005,43205

Dear Glen Morgan:

The Public Disclosure Commission (PDC) has completed its initial review of the complaint you filed on November 21, 2018. Your complaint alleged that the Kitsap County Democratic Central Committee may have violated RCW 42.17A.220 for failure to timely deposit contributions and .235 for failure to timely report contributions and expenditures.

PDC staff reviewed your allegations, and as a result of staff’s initial review, we found the following:

- In 2017, the Kitsap County Democratic Central Committee late deposited a total of \$1,736 in contributions, or 7.68% of total contributions in that year, beyond the five business days of receipt requirement provided by RCW 42.17A.220.
- In 2017, the Kitsap County Democrats late reported \$5,178 in contributions, or 23% of total contributions, on C-3 reports filed as much as 86 days after the statutory deadline set by RCW 42.17A.235.
- That same year, they also late reported \$178, or 1% of total contributions, and \$953, or 6% of total expenditures, on C-4 reports filed as much as 15 days late.
- In 2018, the Kitsap County Democrats late reported \$2,039, or 6% of total contributions, on C-3 reports filed as much as 21 days after the statutory deadline set by RCW 42.17A.235.
- That same year, they also late reported \$17,758, or 48% of total contributions, and \$6,679, or 19% of total expenditures, on C-4 reports filed as much as 6 days late.
- The Kitsap County Democrats independently filed their late reports prior to complaint initiation, have acknowledged and taken responsibility for the non-compliance, and have no prior found violations of PDC laws or rules.

Based on these initial findings, staff has determined that in this instance, failure to timely deposit contributions and to timely report contribution and expenditure activity do not amount to actual material violations warranting further investigation.

Pursuant to WAC 390-37-060(1)(b), Kitsap County Democratic Central Committee will receive a formal written warning concerning their failure to timely deposit contributions within five business days of receipt, and failure to timely report contribution and expenditure activity. The formal written warning will include staff's expectation that Kitsap County Democratic Central Committee institutes procedures to ensure funds are timely deposited and reports are filed according to their statutory deadlines. The Commission will consider the formal written warning in deciding on further Commission action if there are future violations of PDC laws or rules.

Based on this information, the PDC has dismissed this matter in accordance with RCW 42.17A.755(1), and will not be conducting a more formal investigation into your complaint or pursuing further enforcement action in this case.

If you have questions, you may contact Fox Blackhorn at 1-360-753-1980 toll-free at 1-877-601-2828, or by e-mail at pdc@pdc.wa.gov.

Sincerely,

/s _____
Fox Blackhorn
Compliance Coordinator 2

Endorsed by,

/s _____
For Peter Lavalley
Executive Director

cc: Kitsap County Democratic Central Committee